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Of Counsel:
MARSHALL A. MINTZ

June 6, 2023

Hon. Mark A. Kearney
United States District Court Judge
James A. Byrne U.S. Courthouse
601 Market Street, Room 6613
Philadelphia, Pennsylvania 19106

Re: U.S. v. LaForte et. al.
2:23-CR-00198 (MAK)

Dear Judge Kearney,

We represent Defendant Joseph LaForte ("LaForte"). We write in response to the Court's Order dated June 6, 2023, ECF # 43.

Defense counsel has previously and extensively discussed with our client the Speedy Trial Act, 18 U.S.C. § 3161, and whether this matter would be designated a complex case pursuant to 18 U.S.C. § 3161(h)(7)(B)(ii).

Our client has already stated to defense counsel that he desires to waive his Speedy Trial rights and not contest what he understands to be an appropriate complex case designation. Indeed, these issues were argued on the record before Magistrate Lloret at Mr. LaForte's detention hearing, at which time counsel argued that the case was likely to be designated complex and that the client's Speedy Trial rights would be waived.

It is defense counsel's present intention to visit with Mr. LaForte on June 8, 2023, prior to the telephone conference scheduled for 8:45 a.m. that morning, in order to have him execute the waiver of speedy trial rights form attached to the Court's Order, ECF # 43, and to obtain his consent to counsel Joseph Corozzo's appearance on the telephone conference.

Thank you for your consideration.

Respectfully submitted,

/s/ Brian McMonagle

Brian McMonagle


Joseph R. Corozzo

RUBINSTEIN & COROZZO, LLP

cc: A.U.S.A. Alexandra M. Lastowski (via ECF)
A.U.S.A. Matthew Todd Newcomer (via ECF)
A.U.S.A. Patrick Joseph Murray (via ECF)